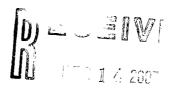
US EPA RECORDS CENTER REGION 5



Fax +1 309 697 94:93



CERTIFIED MAIL

Evonik Goldschmidt. Corp 8300 West Route 24 Mapleton, IL 61547 www.evonik.com Phone +1 309 697 46220

December 13, 2007

Illinois Environmental Protection Agency Bureau of Land, Permit Section (#33) 1021 North Grand Ave. East P.O. Box 19276 Springfield, IL 62794-9276

RE: Evonik Goldschmidt Corp. - Mapleton Facility

Site # (IEPA): 1438050006 USEPA ID#: ILD 095792859

Enclosed please find an application for Permit to Manage Waste (LPC-PA16) for your appropriate action.

This request is a result of name change for the above referenced facility. The facility was formerly under the name of Degussa/Goldschmidt Chemical Corp.

Should you have any questions, please contact me at 309/634-3322.

Sincerel

Serin R. Rao, P.E.

Safety, Health and Environmental Affairs

cc: USEPA - Region V / Chicago

RCRA Division



Illinois Environmental Protection Agency Bureau of Land 1021 North Grand Avenue East Box 19276 Springfield, IL 62794-9276

NOTICE OF APPLICATION FOR PERMIT TO MANAGE WASTE (LPC-PA16)

Date:	12/03/07		
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To Elected Officials and Concerned Citizens:

The purpose of this notice is to inform you that a permit application has been submitted to the IEPA, Bureau of Land, for a solid waste project described below. You are not obligated to respond to this notice, however, if you have any comments, please submit them in writing to the address below, or call the Permit Section at 21"/524-3300, within twenty-one (21) days.

Illinois Environmental Protection Agency
Bureau of Land, Permit Section (#33)
1021 North Grand Avenue East, Post Office Box 19276
Springfield, Illinois 62794-9276

The permit application, which is identified below, is for a project described at the bottom of this page.

SITE IDENTIFICATION Site Name: Evonik Goldschmidt Co Address: 8300 W. Route 24 City: Mapleton, IL	rporation	Site # (IEPA): 1438050006 County: Peoria		
New Landfill	Landfill Land Treatment Transfer Station Treatment Facility Storage Incinerator Composting Recycling/Reclamation Other		General Municipal Refuse Hazardous Special (Non-Hazardous) Chemical Only (exec. putrescible) Inert Only (exec. chem. & putrescible) Used Oil Solvents Landscape/Yard Waste Other (Specify)	
Name Change notification; Previously (USEPA ID #ILD095792859)	y it was known as: Degussa/Golo	dschmidt C	Chemical Corporation.	

Please retain a copy for your own use.

jab\002711i.doc IL 532 0334 LPC 040 Rev. Feb. 03 This Agency is authorized to require this information under Illinois Revised Statutes, 1979, Chapter 111 1/2, Section 1039. Disclosure of this information is required under that Section. Failure to do so may prevent this form from being processed and could result in your application being denied. This form has been approved by the Forms Management Center.

8-11-54-1 Witco

COLPANS USEXT

Witco Corporation U.S. Route 24 P.O. Box 9 Mapleton, IL 61547 (309) 697-6220 (309) 697-9493 Fax

7

January 21, 1997

Federal Express

Greg Sanders
Illinois Environmental Protection Agency
Division of Land Pollution
2200 Churchill Road
Springfield, IL 62794-9276

RE: Sherex Chemical Co., Inc. - Mapleton Plant (A wholly owned subsidiary of Witco Corp.)

Dear Mr. Sanders:

Enclosed please find the plant layout drawings as we discussed on January 21, 1997. The five (5) Solid Waste Management Units (SWMUs) have been identified on these drawings.

Should you have any questions, please contact me at 309/697-6220, Ext. 322.

Sincerely,

Serin R. Rao, P.E.

Manager

Safety, Health, and Environmental Affairs

SRR:ksw g:l-swmu

Enclosures

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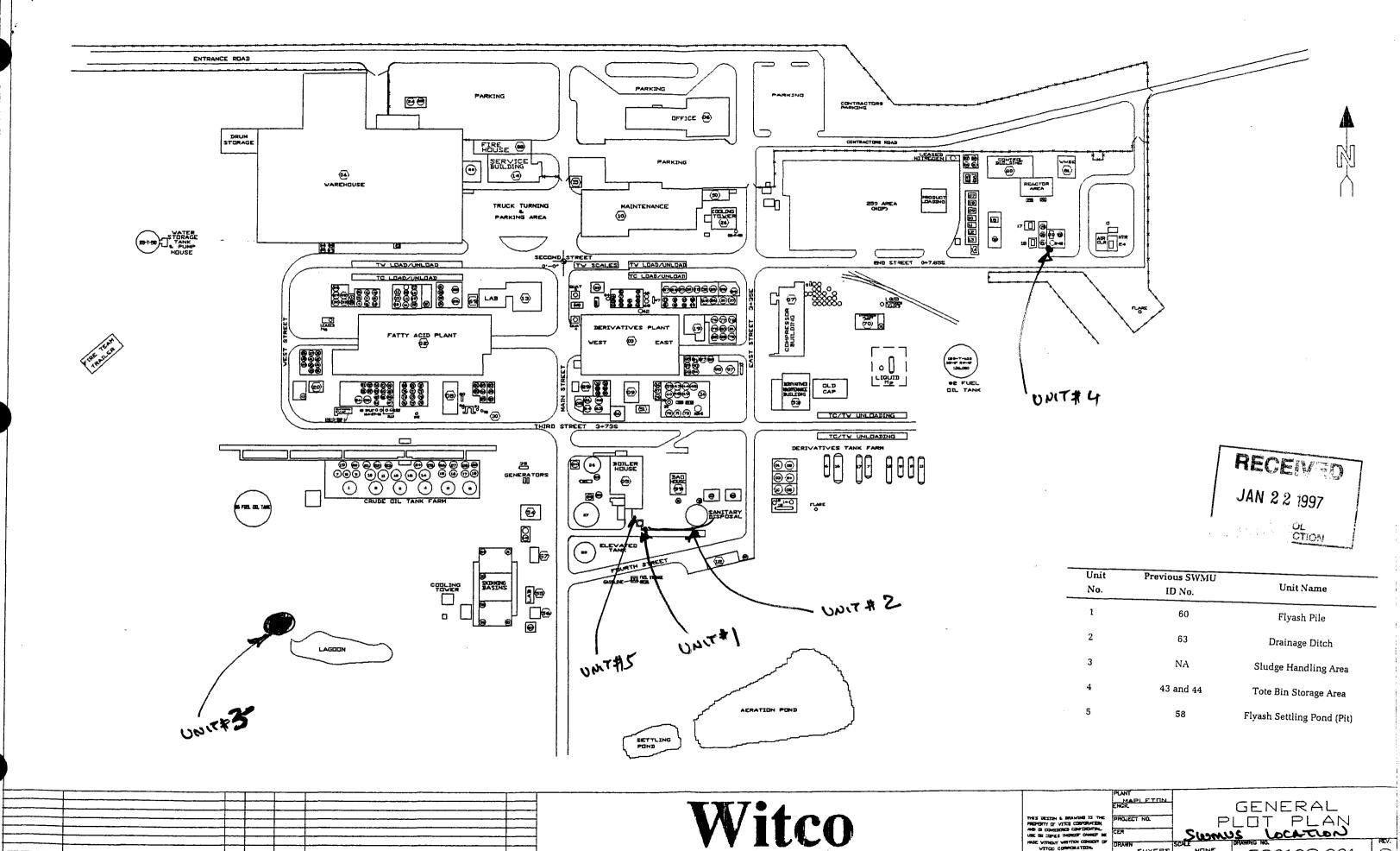
Note: Original Full Scale
Drawing of facility.
Copy should be in
Part B of RCRA
permit application







A Company Dedicated To Total Quality



Witco Corporation

REV. DATE

G90102.001

9

SHYERS

1-10-88



Witco Corporation, U.S. Rt. 24, P.O. Box 9, Mapleton, IL 61547 Telephone: 309-697-6220 Fax: 309-697-9493 June 3, 1994

Mr. Mark Crites Illinois Environmental Protection Agency Division of Land Pollution Control **Permits Section** 2200 Churchill Road P.O. Box 19276 Springfield, Illinois 62794-9276

RECEIVED WMD RECORD CENTER

AUG 05 1994

RE: Witco/Sherex Chemical Company, Inc. Mapleton Facility - Peoria County **EPA Waste Codes** USEPA #ILD095792859, IEPA LPC #143805006 Draft RCRA Part B Permit/Comments

Dear Mr. Crites:

This is to request that the additional waste codes as applicable to the waste streams must be included in the final permit. As we discussed on April 25, 1994, the additional waste codes for the waste streams are not addressed in the "draft" permit.

Sherex is submitting the attached information pertaining to the additional EPA waste codes for the waste streams being managed at the facility. This information had been previously furnished for the Agency's records.

Since the submittal of this information on November 19, 1992, the chlorinated lab spent solvent waste stream doesn't contain carbon tetrachloride. The usage of the carbon tetrachloride has been discontinued and therefore, the additional waste code of D019 (carbon tetrachloride) for this waste stream is no longer applicable.

Should you have any questions in regard to this submittal, please contact me at 309/697-6220, Ext. 322.

Sincerely,

Serin R. Rao, P.E.

Manager

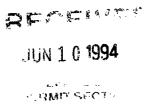
Safety, Health, and Environmental Affairs

SRR:ksw g:l-rcra

\ttachments









November 19, 1992



Mr. James Moore, P.E.
Illinois Environmental Protection Agency
Division of Land Pollution Control
Permits Section
2200 Churchill Road
P.O. Box 19276
Springfield, Illinois 62794-9276

Sherex Chemical Company, Inc.

P O. Box 9 U.S. Route 24 Mapteton, IL 61547 Telephone: (309) 697-6220 Telefax: (309) 697-9493

RE: Witco/Sherex Chemical Company, Inc.

Mapleton Facility - Peoria County

Waste Codes

USEPA ID #ILD095792859, IEPA LPC #143805006

Dear Mr. Moore:

As per our discussion, Sherex is submitting the following information pertaining to the additional EPA waste codes for the waste streams being managed at the Mapleton facility:

	Wastestream Chlorinated Lab	Waste Code F002	Additional Waste Code D019/D022	Managed As > 90 day storage
	Spent Solvent Non-chlorinated	F003/F005	D001	(storage area #1) > 90 day storage
3.	Lab Spent Solvents Mercury Acetate Pitch Lab Waste	D009	F002	(storage area #1) > 90 day storage (storage area #1)
4.	Metal Alkyl Rinse Solution/Metal Alkyls	D001	D003	< 90 day storage
5.	in Mineral Oil Naptha Tool Cleaning Solvent	D001	D018/D039(1)	< 90 day storage
6.	(Safety-Kleen) Methanol Water Ignitable	D001	F003	< 90 day storage
7.	Contaminated oil w/ Process Materials	D001	D018/D008(2)	< 90 day storage

Should you have any questions in regard to this subject matter, please contact me at 309/697-6220, Ext. 222.

Dept.

Sincerely,

Serin R. Rao, P.E.

Manager

Environmental, Health, & Safety

SRR:ksw g:l-wcodes NOTE: (1) Per Safety-Kleen MSDS

(2) Needs Verification through Sampling

Post-It™ brand fax transmittal memo 7671

673-5467

of pages >

Wites / There

From Co.

Phone #

PECT : USEPA

Formerly Sherex Chemical Company, Inc.

Witco Corporation, U.S. Rt. 24, P.O. Box 9, Mapleton, IL 61547 Telephone: 309-697-6220 Fax: 309-697-9493

February 17, 1993

Mr. Lawrence W. Eastep, P.E. Permit Section Manager Division of Land Pollution Control Illinois Environmental Protection Agency 2200 Churchill Road, P.O. Box 19276 Springfield, Illinois 62794-9276

RE: Sherex Chemical Co. v. IEPA, PCB No. 91-202 (Permit Appeal)

Dear Mr. Eastep:

Please issue a revised final RCRA Part B permit, consistent with the July 30, 1992 Pollution Control Board Order and consistent with the agreements between Sherex and the IEPA as contained in the May 7, 1992 Stipulation and the February 4, 1993 Additional Stipulation. Specifically, the following sections should be revised as follows:

Section II -- Standard Conditions

14. Reporting Planned Changes.

Replace the first sentence with:

IEPA - DUL PERMIT SECTION The Permittee shall give notice to the Agency as soon as possible of any planned physical alterations or additions to the permitted hazardous waste drum storage areas.

Also, we suggest adding a new paragraph to the "General Requirements" section and renumbering the remaining paragraphs to include the following:

> Stipulation Regarding Modification. The Agency reserves the right to modify the Permit to include SWMUs Nos. 4, 61-62, 66-72 (as identified in the RCRA Facility Assessment) in

FEB 1 9 1993

Section III of the Permit if information develops indicating a release of hazardous constituents from these SWMUs. At that time the Permittee will have full right to appeal the modification, including, but not limited to, any designation that the items are SWMUs or are subject to corrective action, to the Pollution Control Board pursuant to the provisions for permit appeal contained in Sections 39 and 40 of the Environmental Protection Act.

Section III - Corrective Action

A. At the end of paragraph A, add the following sentence:

Agency review and approval of submissions by Sherex pursuant to this "Section III Corrective Action," will be subject to the provisions for permit appeal contained in Sections 39 and 40 of the Environmental Protection Act.

B. At the end of the part of paragraph B immediately preceding the list of SWMUs to be addressed in the RFI, add the following sentence:

Pursuant to the stipulation with the Permittee, the RCRA Facility Assessment identifies as SWMUs three areas which are no longer considered SWMUs: Nos. 4, 66 and 67. Further, SWMUs Nos. 64 and 73, identified in the RCRA Facility Assessment, are not SWMUs pursuant to the Order of the Pollution Control Board.

The list in paragraph B of SWMUs to be addressed in the RFI must be revised to remove items 2, 4 - 11, and 14 (SWMUs Nos. 4, 61-62, 64, and 66-73). The list of items should be revised to list only the following:

- 1. Flyash pile on the ground approximately 25 feet to 30 feet southwest of the flyash settling ponds. (SWMU No. 66) (formerly Item No. 1).
- 2. Drainage Ditch (south of Boiler House). (SWMU No. 63) (formerly Item No. 3).
- 3. Tote bin storage area at the Metal Organics Plant's hydrolysis process area. (SWMU Nos. 43-44) (formerly Item No. 12).

Permit Section Manager February 17, 1993 Page 3

> 4. Flyash Settling Pond. (SWMU No. 58) (formerly Item No. 13).

Finally, add the following to the list:

5. Lime Sludge Transfer Area. Area approximately 70' by 100' at the northwest corner of the lime sludge lagoon used for loading lime sludge into trucks. (not identified by SWMU number in the RCRA Facility Assessment and not formerly identified as an Item).

In addition, we would like to inform you that on November 2, 1992, Witco Corporation ("Witco") acquired all the shares of Sherex Chemical Company ("Sherex") from Schering Berlin, Inc. Witco presently plans to continue to operate the Sherex manufacturing facility at Mapleton, IL under the Sherex name as a wholly owned subsidiary of Witco Corp.

Thank you for your cooperation in this matter.

Sincerely,

Serin R. Rao, P.E.

Manager

Environmental, Health & Safety

SRR:ksw g:91-202

cc: Percy L. Angelo - Mayer, Brown and Platt

Todd Retting - IEPA





217/524-3300

July 15, 1992

Sherex Chemical Company, Inc. Attn: Serin R. Rao, P.E. Route 24 Post Office Box 9 Mapleton, Illinois 61547

Re: 1438050006 -- Peoria County
Sherex Chemical Company, Inc.
ILD095792859
Illinois Pollution Control Board Docket No. 91-202
RCRA - Permit

Dear Mr. Rao:

This is in response to the document submitted on the behalf of Sherex by Chris Tanner, P.E. of Roy F. Weston, Inc., dated May 29, 1992 associated with resolving the above-referenced permit appeal currently on file with the Illinois Pollution Control Board. This submittal proposed a sampling and analytical plan for three Solid Waste Management Units (SWMUs) at the above referenced facility, as agreed to under a stipulation dated May 7, 1992. Your sampling and analytical plan for the three SWMUs (lime sludge pond, old facility landfill, and old hydrogen plant debris) is hereby approved subject to the following conditions and modifications:

- 1. All analyses for metals must be conducted in accordance with <u>Test Methods</u> for Evaluating Solid Waste, SW-846, Third Edition (SW-846), Method 1311.
- 2. The referenced submittal proposes background sampling, but does not indicate any sampling locations. If background sampling is desired, a minimum of 10 samples per soil stratum must be taken from an area not affected by onsite activities. Background sample locations and results are subject to Agency review and approval.
- 3. Section 2.1 of the referenced submittal indicates that samples to be analyzed for Volatile Organic Compounds will be field screened prior to sampling. The approved soil sampling procedures for volatiles analysis (see Attachment 2) does not allow for such disturbance of samples prior to sampling.
- 4. All samples shall be analyzed individually (i.e., no compositing). Sampling and analytical procedures shall be conducted in accordance with <u>Test Methods for Evaluating Solid Wastes</u>, Third Edition (SW-846) and Attachment 7 to this Agency's closure plan instruction package. When a SW-846 (Third Edition) analytical method is specified, all the chemicals listed in the Quantitation Limits Table for that method shall be reported unless specifically exempted in writing by the Agency. When visually



Page 2

discolored or contaminated material exists within an area to be sampled, horizontal placement of sampling locations shall be adjusted to include such visually discolored and/or contaminated areas. Sample size per interval shall be minimized to prevent dilution of any contamination. Apparent visually contaminated material within a sampling interval shall be included in the sample portion of the interval to be analyzed. To demonstrate a parameter is not present in a sample, analysis results must show a detection limit at least as low as the PQL for that parameter in the third edition of SW-846. For inorganic parameters, the detection limit must be at least as low as the RCRA Groundwater Detection Limits, as referenced in SW-846 (Third Edition) Volume 1A, pages TWO-29 and TWO-30, Table 2-15. If possible, your sampling program should be extensive enough to determine the lateral and vertical extent of contamination to the detection limit (PQLs) referenced above.

- 5. Under the provisions of 29 CFR 1910 (51 FR 15,654, December 19, 1986), cleanup operations must meet the applicable requirements of OSHA's Hazardous Waste Operations and Emergency Response standard. These requirements include hazard communication, medical surveillance, health and safety programs, air monitoring, decontamination and training. General site workers engaged in activities that expose or potentially expose them to hazardous substances must receive a minimum of 40 hours of safety and health training off site plus a minimum of three days of actual field experience under the direct supervision of a trained experienced supervisor. Managers and supervisors at the cleanup site must have at least an additional eight hours of specialized training on managing hazardous waste operations.
- 6. A report documenting the results of the required investigation must be submitted to the Agency by September 30, 1992. This report must include:
 - a. A summary of the results;
 - b. An accurate scaled drawing showing the location where all samples were collected, relative to the regulated unit;
 - c. The depth and interval where samples were collected;
 - d. A description of the soil sampling procedures and sample preservation/chain of custody methods;
 - e. The test methods used and detection limits achieved;
 - f. Actual laboratory reports (copies);
 - g. A discussion of the results;
 - h. Visual classification of all soil samples in accordance with ASTM Method D 2488;



Page 3

- i. Color photographs of the areas from which each sample was collected;
- j. Conclusions based upon a review of the results of the required investigation.

The attached certification form must accompany this report and be signed by an independent registered professional engineer and a responsible officer of Sherex Chemical Company. Signatures must meet the requirements of 35 Ill. Adm. Code Section 702.126. The independent engineer should be present at all critical, major points (activities) during the closure. These might include soil sampling, soil removal, backfilling, final cover placement, etc. The frequency of inspections by the independent engineer must be sufficient to determine the adequacy of each critical activity.

The Illinois Professional Engineering Act (Ill. Rev. Stat., Ch. 111, par. 5101 et seq.) requires that any person who practices professional engineering in the state of Illinois or implies that he (she) is a professional engineer must be registered under the Illinois Professional Engineering Act (par. 5101, Sec. 1). Therefore, any certification or engineering services which are performed for a closure plan in the State of Illinois must be done by an Illinois P.E.

Plans and specifications, designs, drawings, reports, and other documents rendered as professional engineering services, and revisions of the above must be sealed and signed by a professional engineer in accordance with par. 5119, Sec. 13.1 of the Illinois Professional Engineering Act.

7. Any conclusions reached based on the results of the required investigation are subject to Agency review and approval. Final Agency decisions on such matters are subject to the appeal provisions of Sections 39(a) and 40(a) of the Illinois Environmental Protection Act.

Should you have any questions regarding this matter, please contact Mark L. Crites at 217/524-3300.

Very truly yours,

Lawrence W. Eastep, P.E., Manager

Permit Section

Division of Land Pollution Control

Bureau of Land

LWE:MLC/mls/sp208Z/1-3

Attachment

cc: Chris Tanner, P.E.

USEPA Region V -- George Hamper



ATTACHMENT I

This statement is to be completed by both the responsible officer and by the registered professional engineer. Submit one copy of the certification with original signatures and three additional copies.

Certification Statement

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

USEPA ID Number	Facility Name		
Signature of Owner/Operator	Name and Title		
Signature of Registered P.E.	Name of Registered P.E. and Illinois Registration Number		
Date MLC/mls/sp208Z/1-4			



ATTACHMENT II

Soil Volatile Sampling Procedures

Procedure:

- A. PREPARATION AND DECONTAMINATION OF SOIL SAMPLER (i.e., STAINLESS STEEL, BRASS, BRONZE, COPPER, etc.). An example of these samplers would be a Shelby tube, split-barrel sampler with metal tube inserts or California sampler. These are only examples there may be more types available. Also, the sample tube must be at least six inches long.
 - *1. Wash tubing or sampler with hot water and a nonfoaming detergent.

2. Rinse with hot water.

- *3. Rinse with a solvent, such as hexane or acetone.
 - 4. Rinse with very hot water to drive off solvent.
 - Rinse with deionized distilled water.

6. Air dry

- 7. Store the sampler in aluminum foil until ready for use.
- * Consult the laboratory for specific recommendations.

B. SOIL SAMPLING FOR VOLATILE ORGANICS

- 1. Using a properly decontaminated sampler (refer to preparation and decontamination instructions), push or drive the sampler to obtain a representative soil sample.
- 2. DO NOT remove sample from sample tube in the field. The laboratory should remove the sample from the sampling tube.
- 3. Immediately add clay or other cohesive material (i.e. wetted bentonite) to the ends of the sample to eliminate head space, if necessary.
- 4. Cover both ends of the sampler with aluminum foil. If possible, cover the aluminum foil with a cap.
- 5. Put the sample in storage at 4 degrees centigrade immediately.
- 6. Transport the samples to the laboratory as soon as possible. Most laboratories require delivery within 24 hours of sampling.

NOTE: Soil samples which will be tested for volatile organic constituents cannot be composited because of the volatilization which would result from any compositing method.

MLC/m1s/sp208Z/5

Park B 111 •

June 11, 1991

P.O. Box 19276



Mr. Lawrence W. Eastep, P.E., Manager Illinois Environmental Protection Agency Division of Land Pollution Control - #24 Permits Section 2200 Churchill Road

Springfield, Illinois 62794-9276

<u>Certified</u>

Sherex Chemical Company, Inc.

P.O. Box 9 U.S. Route 24 Mapleton, IL 61547 Telephone: (309) 697-6220 Telefax: (309) 697-9493

RE: LPC #1438050006 - Peoria Co.

Sherex Chemical Co., Inc.

ILD095792859

RCRA Permit Log #111

Dear Mr. Eastep:

This is in response to Mark Crites telephone call inregard to the drawings contained in the RCRA Part B permit application.

Sherex is not considering the drawings contained in the permit application to be of any confidential nature. Therefore, Sherex is not requesting that the drawings be kept confidential.

Should you have any questions, please contact me at (309) 697-6220, Ext. 322.

Sincerely,

'Serin R. Rao, Manager,

Environmental, Health & Safety

SRR: ksw

a:ltr-6-11

RECEIVED

JUN 1 3 1991

IEPA-DLPC



Illinois Environmental Protection Agency . P. O. Box 19276, Springfield, IL 62794-9276

217/782-6762

Refer to:

LPC #1438050006 -- Peoria County

Sherex Chemical Company

ILD095792859

RCRA Permit Log No. 111

January 16, 1991

Sherex Chemical Company, Inc. Attn: Hartmut Halfmann, V.P. Operations 5777 Frantz Road Dublin, Ohio 43017

Dear Mr. Halfmann:

The Illinois Environmental Protection Agency has reviewed Part B of the RCRA permit application for the two (2) hazardous waste container (SO1) storage areas dated November, 1988 and November 5, 1990 and received November 9, 1988, May 2, 1990 and November 7, 1990 for the above-referenced facility. A list of the deficiencies identified during this second technical review is included in the attached Notice of Deficiency (NOD).

Each of the deficiencies must be addressed before this Agency can complete the technical review of your permit application. Your response must be submitted in quadruplicate and postmarked no later than April 1, 1991. The response should be in a format which allows incorporation of the new information into the appropriate sections of your application. To allow for a proper review of this new information, the location of the response to each deficiency should be identified in a list cross-referencing these items. Each revised page or drawing must have the revision date identified on them for tracking purposes. Failure to respond adequately by April 1, 1991 may result in the issuance of a Notice of Intent to Deny your application for permit.

A certification identical to that outlined in 35 Ill. Adm. Code 702.126 must accompany your submission. The original and three copies of the new information and certification should be submitted to the following address:

> Illinois Environmental Protection Agency Division of Land Pollution Control -- #24 Permit Section 2200 Churchill Road Post Office Box 19276 Springfield, Illinois 62794-9276



Page 2

If you have any questions regarding this subject, feel free to contact G. Tod Rowe of my staff at 217/782-6762.

Very truly yours,

Lawrence W. Eastep, P.E. Manager

Permit Section

Division of Land Pollution Control

LWE:GTR:jas/0016q,91-92

Enclosure

cc: Division File, w/enclosure Peoria Region, w/enclosure George Hamper, USEPA Region V, w/enclosure Administrative Record, w/enclosure G. Tod Rowe, w/enclosure Serin R. Rao, P.E., Sherex Chemical Co., w/enclosure



NOTICE OF DEFICIENCIES SECOND TECHNICAL REVIEW

SHEREX CHEMICAL COMPANY MAPLETON, ILLINOIS 61547

RCRA Permit Log No. 111 LPC # 1438050006 ILD095792859 January 16, 1991

Subject Requirements: 35 Ill. Adm. Code Subtitle G

G. CONTINGENCY PLAN

- 1. The contingency plan must include the necessary information and descriptions to satisfy the requirements of 35 IAC Part 724.156. The contingency plan and supporting documentation must be revised to demonstrate that the following information and requirements were considered and addressed, at a minimum:
 - a. type, amount, and variety of waste in the building.
 - b. location of waste.
 - c. waste handling practices.
 - d. possible hazards that may result from a release, fire, or explosion (e.g., the effects of any toxic, irritating or asphyxiating gases that are generated, or the effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat-induced explosions). This will require an estimation of the quantities and types of gases that could be generated.
 - e. the effects of weather conditions in the event of a release, fire, or explosion.
 - f. identify the possible hazards to human health or the environment (on-site and off-site) that may result from a release, fire, or explosion.

- g. describe how the emergency coordinator (EC) will determine if a release, fire or explosion could threaten human health or the environment outside the facility. Identify the type of information and criteria the EC would use in arriving at such a determination. In addition, estimate the time it would take to make such a determination and compare that to the time it would take material resulting from a release, fire or explosion to travel off-site.
- h. how will the EC determine if evacuation of local areas maybe advisable? As in g. above, identify the type of information and criteria the EC will use and make a time comparison of the time necessary to make such a determination to the time an off-site impact is estimated to occur.
- i. who will the EC notify if evacuation of the local areas is determined to be advisable.

Revise the contingency plan and supporting documentation as necessary to incorporate the information determined above. If any of the results are generated by computer (i.e. emission/dispersion models, etc.) the model(s) must be identified. In addition, the Agency may require the owner/operator to provide an original copy of the model(s) so that the Agency can verify computer generated data.

- The following comments address item 20 on page 44(g) of Section G, dated revision 11/5/90:
 - a. How will the emergency coordinator determine if a spill could threaten human health and the environment? What criteria will be used to make this determination? Also, these notifications are required for potential on-site and off-site impacts, not just for outside the facility [35 IAC 724.151(b)].
 - b. The risk assessment (air dispersion model) must be done now to determine the effects off-site. [Also see item G.1 above]

K-3 Prior Conduct Certifications:

The September 14, 1990 NOD required, pursuant to Section 39i of the Environmental Protection Act, Sherex must complete and submit to the Agency the attached Prior Conduct Certification Evaluation Form. Please note that multiple copies of the form may need to be submitted pursuant to the signature requirements of 35 IAC 702.126.

In response to the September 14, 1990 NOD Sherex provided a prior conduct certification form. However, the certification form was not correctly filed out. Sherex must submit a revised form that addresses the following comments:

- a. The owner/operator name must be the same as the signature of applicant on the form.
- b. The social security number must be the social security number of the applicant on the form.
- c. The site code must be the Illinois EPA, DLPC site number for the facility. However, you can provide both the IEPA and USEPA numbers.



Illinois Environmental Protection Agency P. O. Box 19276, Springfield, IL 62794-9276

217/782-6762

Refer to: LPC #1438050006 -- Peoria County

Sherex Chemical Company

ILD095792859

RCRA Permit Log No. 111

September 14, 1990

Sherex Chemical Company, Inc. Serin R. Rao, P.E., Plant Environmental Engineer Post Office Box 9 Mapleton, Illinois 61 547

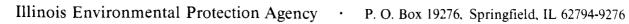
Dear Mr. Rao:

The Illinois Environmental Protection Agency has reviewed Part B of the RCRA permit application for the two (2) hazardous waste container (SOI) storage areas dated November, 1988 and received November 9, 1988 and May 2, 1990 for the above-referenced facility. A list of the deficiencies identified during this initial technical review is included in the attached Notice of Deficiency (NOD).

Each of the deficiencies must be addressed before this Agency can complete the technical review of your permit application. Your response must be submitted in quadruplicate and postmarked no later than November 5, 1990. The response should be in a format which allows incorporation of the new information into the appropriate sections of your application. To allow for a proper review of this new information, the location of the response to each deficiency should be identified in a list cross-referencing these items. Each revised page or drawing must have the revision date identified on them for tracking purposes.

A certification identical to that outlined in 35 Ill. Adm. Code 702.126 must accompany your submission. The original and three copies of the new information and certification should be submitted to the following address:

> Illinois Environmental Protection Agency Division of Land Pollution Control -- #24 Permit Section 2200 Churchill Road Post Office Box 19276 Springfield, Illinois 62794-9276





Page 2

If you have any questions regarding this subject, feel free to contact G. Tod Rowe of my staff at 217/782-6762.

Very truly yours,

Lourencell Eastephys

Lawrence W. Eastep, P.E., Manager

Permit Section

Division of Land Pollution Control

LWE:GTR:sf/3273n,5-6

Enclosure

cc: Division File, w/enclosure
Peoria Region, w/enclosure
George Hamper, USEPA Region V, w/enclosure Administrative Record, w/enclosure



NOTICE OF DEFICIENCIES INITIAL TECHNICAL REVIEW

SHEREX CHEMICAL COMPANY MAPLETON, ILLINOIS 61547

RCRA Permit Log No. 111 LPC # 1438050006 ILD095792859 September 14, 1990

Subject Requirements: 35 Ill. Adm. Code Subtitle G

C. WASTE CHARACTERISTICS

C-2 Waste Analysis Plan

- 1. Sherex must revise the WAP to;
 - a. Include the tests required by the new Toxicity Characteristics Rule (i.e. TCLP analysis)
 - b. Provide detail on how the procedures in the WAP would determine which compatibility group listed in 40 CFR Part 264, Appendix V the waste would belong. If the proposed procedures fail this criteria Sherex must revise the WAP to meet this criteria. NOTE: the storage area must also be segregated by this criteria.
 - c. Section C-2b must include the test methods for samples being analyzed for characteristics of ignitability, corrosivity, reactivity, and toxicity.
 - d. The D001 waste stream must also evaluated for toxicity (TCLP).

D. PROCESS INFORMATION

D-1a(1) Description of Containers

- A. Sherex should provide a computerized information system for the waste storage areas to allow immediate access to emergency personnel the following information, at a minimum;
 - a. Volume of each waste type,
 - b. Types of wastes presently stored, and
 - c. Which storage area the waste is stored in.
- B. Section D, Page 3, Part D-1, last sentence, must be revised to break-up the maximum inventory to give the maximum inventory for each storage area separately.
- C. Sherex must address the following question;
 - a. How will the proposed containment system prevent,
 - i. drums from being knocked outside the containment?; and
 - ii. prevent a release of waste if the drum becomes punctured and the waste pours from a hole in the side of the drum?

D-la(3)(c) Containment System Capacity

How does the containment capacity of each secondary containment pallet compare to the maximum amount of waste to be stored on the pallet?

D-1b(2) <u>Desertion of Containers</u>

Section D-1b, page 9, states all wastes will be stored in 55-gallon drums. However, Section D-1b(2) references the use of 55-gallon and 5-gallon drums. This discrepancy must be corrected.

G. CONTINGENCY PLAN

The contingency plan must include the necessary information and descriptions to satisfy the requirements of 35 IAC Part 724.156. In order to develop the necessary information Sherex must perform a hazard evaluation of the hazardous waste management activities associated with the Hazardous Storage Areas. Such an evaluation must consider the following at a minimum:

- a. type, amount, and variety of waste in the building.
- b. location of waste.
- c. waste handling practices.
- d. possible hazards that may result from a release, fire, or explosion (e.g., the effects of any toxic, irritating or asphyxiating gases that are generated, or the effects of any hazardous surface water run-off from water or chemical agents used to control fire and heat-induced explosions).
- e. the effects of weather conditions in the event of a release, fire, or explosion.
- f. identify the possible hazards to human health or the environment (on-site and off-site) that may result from a release, fire, or explosion.
- g. describe how the emergency coordinator (EC) will determine if a release, fire or explosion could threaten human health or the environment outside the facility. Identify the type of information and criteria the EC would use in arriving at such a determination. In addition, estimate the time it would take to make such a determination and compare that to the time it would take material resulting from a release, fire or explosion to travel off-site.
- h. how will the EC determine if evacuation of local areas maybe advisable? As in g. above, identify the type of information and criteria the EC will use and make a time comparison of the time necessary to make such a determination to the time an off-site impact is estimated to occur.

i. who will the EC notify if evacuation of the local areas is determined to be advisable.

Revise the contingency plan as necessary to incorporate the information determined above.

G-8 Required Reports

All reports required by the contingency plan must be sent to the Planning and Reporting Section of the Division of Land Pollution Control and the IEPA Emergency Response Unit.

I. CLOSURE AND POST-CLOSURE REQUIREMENTS

The interim status 35 IAC Part 725 closure plan for the old storage area #1 must be submitted separately to the Agency for review and approval. Hazardous waste management units for which a Part B permit is not being pursued, must cease operation and initiate closure by no later than November 8, 1992.

K-1 Certifications

Pursuant to Section 39i of the Environmental Protection Act, Sherex must complete and submit to the Agency the attached Prior Conduct Certification Evaluation Form. Please note that multiple copies of the form may need to be submitted pursuant to the signature requirements of 35 IAC 702.126.



Illinois Environmental Protection Agency P. O. Box 19276, Springfield, IL 62794-9276

217/782-6762

Refer to: LPC # 1438050006 -- Peoria County

Sherex Chemical Company

ILD095792859

RCRA Permit Log No. 111

December 23, 1988

Sherex Chemical Company, Inc. Serin R. Rao. Plant Environmental Engineer P.O. Box 9 Mapleton, IL 61 547

Dear Mr. Rao:

The Illinois Environmental Protection Agency has reviewed Part B of the RCRA permit application for hazardous waste container (SO1) storage dated November 7, 1988 and received November 9, 1988 for the above-referenced facility. A list of the deficiencies identified during this initial completeness review is included in the attached Notice of Deficiency (NOD).

Each of the deficiencies must be addressed before this Agency can complete the completeness review of your permit application. Failure to provide financial assurance in accordance with the requirements of 35 IAC Parts 703 and 724 with the resubmittal may result in denial of the application for permit. Your response must be submitted in quadruplicate and postmarked no later than May 1, 1990. The response should be in a format which allows incorporation of the new information into the appropriate sections of your application. To allow for a proper review of this new information, the location of the response to each deficiency should be identified in a list cross-referencing these items. Each revised page or drawing must have the revision date identified on them for tracking purposes.

A certification identical to that outlined in 35 Ill. Adm. Code 702.126 must accompany your submission. The original and three copies of the new information and certification should be submitted to the following address:

> Illinois Environmental Protection Agency Division of Land Pollution Control -- #24 Permit Section 2200 Churchill Road Post Office Box 19276 Springfield, Illinois 62794-9276



Page 2

If you have any questions regarding this subject, feel free to contact G. Tod Rowe of M staff at 217/782-6762.

Very truly yours,

Permit Section

Division of Land Pollution Control

LWE:GTR:b1s/3810j,23,24

Enclosure

cc: Division File, w/enclosure

Peoria Region, w/enclosure George Hamper, USEPA Region V, w/enclosure

Mary Murphy, USEPA Region V Compliance Section

Peggy J. Vince, Sherex, w/enclosure

NOTICE OF DEFICIENCIES INITIAL COMPLETENESS REVIEW

December 23, 1988

LPC #1438050006 -- Peorial County Sherex Chemical Company ILD095792859 Part B Log # 111

Subject Requirement: 35 Illinois Administrative Code Section Nos.

A. Part A Application: 702.123, 702.126(a) and (d), 703.181

The application is not complete and/or consistent with the Part B application for the following reasons:

1. Unit of Measure for Process Capacity is incorrect.

B. FACILITY DESCRIPTION

B-1 General Description: 703.183(a)

Describe the facility, including the nature of the business. Off-site facilities should identify the types of industry served; on-site facilities should briefly describe the process(es) involved in the generation of hazardous waste.

B-2 Topographic Map: 703.183(s), 703.185(c), 703.185(d), 724.195, 724.197

B-2a General Map Requirements: 703.183(s)

The map must show the facility and a distance of 1,000 feet around it, at a scale of 1 inch equal to not more than 200 feet. The map must include: contours sufficient to show surface water flow around facility unit operations, map date, 100-year floodplain area, surface waters, surrounding land uses, a wind rose, map orientation, and legal boundaries of facility site. The map should also indicate the location of access control, injection and withdrawal wells, buildings, structures, sewers, loading and unloading areas, fire control facilities, flood control or drainage barriers, run-off control sytsems, and (proposed) new and existing hazardous waste operation units and solid waste management units. Multiple maps may be submitted to meet the above requirements, if necessary, but should be at a scale of 1 inch equal to not more than 200 feet.

B-3b Floodplain Standard: 703.184(c), 724.118(b)

Document whether or not the facility is located within a 100-year floodplain, and include the source of data (Federal Insurance Administration Map or equivalent maps and calculations).

B-3b(1) Demonstration of Compliance: 703.184(d), 724.118(b)

For facilities located within the 100-year floodplain, describe how the facility is designed, constructed, operated, and maintained to prevent washout of any hazardous waste during a flood.

B-3b(1)(a) Flood Proofing and Flood Protection Measures: 703.184(d)(1) and (d)(2)

Provide a structural or other engineering study showing how the design of the hazardous waste units and the flood proofing and protection devices at the facility will prevent washout.

B-3b(1)(b) Flood Plan: 703.184(d)(3), 724.118(b)(1)(A)

Describe the procedures to be followed to remove hazardous waste to a safe location before the facility is flooded, including timing related to flood levels, estimated time to move the waste, the location to which the waste will be moved, demonstration that those facilities will be eligible to receive hazardous waste, the planned procedures, equipment, and personnel to be used, and the potential for accidental discharge of the waste during movement.

B-3b(3) Plan for Future Compliance with Floodplain Standard: 703.184(e)

For facilities located within the 100-year floodplain that do not comply with the floodplain standard, show how and when the facility will be brought into compliance.

B-4 Traffic Information: 703.183(j)

Provide the following traffic-related information:

. Traffic patterns on site;

Estimated volumes, including number and types of vehicles;

Traffic control signs, signals and procedures; and

. Adequacy of access roadway surfaces and load bearing capacity for expected traffic at the site.

C. WASTE CHARACTERISTICS

C-1 Chemical and Physical Analyses: 703.183(b), 724.113(a)

For each hazardous waste stored, treated or disposed at the facility, describe the waste, the hazard characteristics, the basis for hazard designation, and provide a laboratory report detailing the chemical and physical analyses of representative samples.

C-2 Waste Analysis Plan: 703.183(c), 724.113(b) and (c)

Provide a copy of the waste analysis plan that describes the methodologies for conducting the analyses required to properly treat, store, or dispose of hazardous wastes.

C-2c Sampling Methods: 724.113(b)(3), 40 CFR 261 - Appendix I

List the sampling methods used to obtain a representative sample of each waste to be analyzed and document that the chosen method is appropriate for the type and nature of the waste.

C-2d Frequency of Analyses: 724.113(b)(4)

Describe the frequency at which the analyses will be repeated.

C-2f Additional Requirements for Ignitable, Reactive or Incompatible Wastes: 724.113(b)(6), 724.117

Describe the methods used to meet additional waste analysis requirements necessary for treating, storing, or disposing ignitable, reactive or incompatible wastes.

C-3 Quality Assurance: 702.145

Provide a quality assurance plan, in accordance with the standards established in the Third Edition of SW-846, for laboratory analysis of wastes.

- D. PROCESS INFORMATION
- D-1 Containers
- D-la <u>Containers with Free Liquids</u>

D-la(1) Description of Containers: 724.271, 724.272

Provide the following information about the containers used to treat or store hazardous waste: approximate number of each type of container, construction materials, dimensions and usable volumes, DOT specifications or other manufacturer specifications, liner specifications (if applicable), container condition (new, used, reconditioned), and markings and labels.

D-la(2) Container Management Practices: 724.273

Describe container management practices used to ensure that hazardous waste containers are always kept closed during storage, except when adding, or removing or sampling waste, and are not opened, handled, or stored in a manner that may cause them to rupture or to leak. Include a discussion of procedures for transporting containers within the facility. Indicate the aisle space maintained between rows of containers and provide the maximum number, volume and stacking height of containers for each area in which containers are stored.

D-la(3) Secondary Containment System Design and Operation: 703.201(a)(1), 724.275(a) and (d)

Provide design and profile drawings of the existing or planned container storage area(s), showing the secondary containment system and the arrangement of containers. Indicate on the drawings the areas in which incompatible wastes will be stored.

D-la(3)(a) Requirement for the Base or Liner to Contain Liquids: 724.275(a)(1)

Demonstrate the capability of the base to contain liquids, including:

- . A statement that the base is free of cracks or gaps;
- . Demonstration of imperviousness of base to wastes and precipitation;
 - Base design and materials of construction;
- . An engineering evaluation of the base's structural integrity; and
- . Discussion of compatibility of the base with wastes.

D-la(3)(b) Containment System Drainage: 703.201(a)(2), 724.275(b)(2)

The base must be sloped or the containment system must be otherwise designed and operated to drain and remove liquids resulting from leaks, spills, or precipitation, unless the containers are elevated or are otherwise protected from contact with accumulated liquids.

D-la(3)(c) Containment System Capacity: 703.201(a)(3), 724.275(b)(3)

Provide calculations which demonstrate that the containment system will have sufficient capacity to contain at least 10 percent of the volume of the containers or the volume of the largest container, whichever is greater. This demonstration must discuss the volume of the largest container, total volume of containers, containment structure capacity, and volume displaced by containers and other structures in the containment system.

D-la(3)(d) Control of Run-on: 703.201(a)(4), 724.275(b)(4)

Run-on into the containment system must be prevented unless the collection system has sufficient excess capacity in addition to that required in the above paragraph to contain any run-on that might enter the system. Describe the dikes, berms, drainage system, etc., used to prevent run-on, or provide calculations demonstrating that the containment system has sufficient excess capacity to contain run-on. A 24-hour, 25-year storm event can be used as the basis for the calculations.

D-1a(4) Removal of Liquids from Containment System: 703.201(a)(5), 724.275(b)(5)

Spilled or leaked waste and accumulated precipitation must be removed from the sump or collection area in a timely manner to prevent overflow of the containment system. Describe the procedures and equipment used during liquid removal. Provide sump, pump and piping drawings, if applicable. Specify the methods for determining whether the removed material is a hazardous waste and for handling as such.

D-1b CONTAINERS WITHOUT FREE LIQUIDS

D-1b(1) Test for Free Liquids: 703.201(b)(1), 729.320

Submit the test results or other documentation or information to show that the wastes to be stored do not contain free liquids (e.g. EPA Method No. 9095).

D-1b(2) Description of Containers: 724.271, 724.272

Provide the following information about the containers used to treat or store hazardous waste: approximate number of each type of container, construction materials, dimensions and usable volumes, DOT specifications or other manufacturer specifications, liner specifications (if applicable), container condition (new, used, reconditioned), and markings and labels.

D-1b(3) Container Management Practices: 724.273

Describe container management practices used to ensure that hazardous waste containers are always kept closed during storage except when adding or removing waste, and are not opened, handled, or stored in a manner that may cause the container to rupture or to leak. Include a discussion of procedures for transporting containers across the facility. Indicate the aisle space maintained between rows of containers and provide the maximum number, volume and stacking height of containers for each area in which containers are stored. Provide a plan view of the container storage area(s) which show(s) the arrangement of the containers.

D-1b(4) Container Storage Area Drainage: 703.201(b)(2), 724.275(c)

Describe how the storage area is designed or operated to drain and remove liquids unless containers are otherwise kept from contact with standing liquids.

- F-2 Inspection Schedule: 703.183(e), 724.115
- F-2a General Inspection Requirements: 703.183(e), 724.115(a) and (b), 724.133

Describe the facility schedule for inspection of monitoring equipment, safety and emergency equipment, security devices, and operating and structural equipment that are vital to prevent, detect, or respond to environmental or human health hazards. The schedule must be kept at the facility.

F-2a(1) Types of Problems: 724.115(b)(3)

The schedule must identify the types of problems to look for during the inspection.

F-2a(2) Frequency of Inspections: 724.115(b)(4)

Describe the frequency of inspection for items on the schedule. The frequency of inspection should be based on the rate of possible deterioration of equipment and the probability of an environmental or human health incident if the deterioration, malfunction, or operator error goes undetected between inspections. Areas subject to spills, such as loading and unloading areas, must be inspected daily when in use.

F-2b Specific Process Inspection Requirements

F-2b(1) Container Inspection: 724.274

Demonstrate that the containers and the container storage area will be inspected at least once a week for leaks, spills and for deterioration caused by corrosion or other factors.

F-3 Waiver or Documentation of Preparedness and Prevention Requirements

F-3a Equipment Requirements: 703.183, 724.132

All facilities must be equipped with the following equipment unless the applicant can demonstrate that none of the hazards posed by waste handled at the facility could require that particular kind of equipment. Document that the facility possesses the equipment listed below and provide a description of its capabilities, capacity, etc., as appropriate. Note: The location of this equipment must be identified in the Contingency Plan (Item G-5).

F-3a(1) Internal Communications: 724.132(a)

An internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel.

F-3a(2) External Communications: 724.132(b)

Describe the device, such as a telephone (immediately available at the scene of operations) or a handheld two-way radio, for summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams.

F-3a(3) Emergency Equipment: 724.132(c)

Demonstrate the availability of and describe portable fire extinguishers, fire control equipment (including special extinguishing equipment — foam, inert gas or dry chemical), spill control equipment, and decontamination equipment.

F-3a(4) Water for Fire Control: 724.132(d)

Demonstrate that the facility has water at adequate volume and pressure to supply water hose streams, foam producing equipment, automatic sprinklers, or water spray systems.

F-3b Aisle Space Requirement: 724.135

Demonstrate that the facility maintains sufficient aisle space to allow the unobstructed movement of personnel, fire protection equipment, or spill control equipment to any area of facility operation in an emergency. Requests for a waiver of the aisle space requirement must be accompanied by a demonstration that aisle space is not needed for any, or all, of these purposes.

F-4 Preventive Procedures, Structures and Equipment: 703.183(h)

Describe procedures, structures, or equipment used at the facility for the following:

F-4a Unloading Operations: 703.183(h)(1)

Prevention of hazards in unloading operations (e.g., use of ramps or special forklifts).

F-4b Run-off: 703.183(h)(2)

Prevention of run-off from hazardous waste handling areas to other areas of the facility or environment, or prevention of flooding (e.g., berms, dikes. trenches).

F-4c Water Supplies: 703.183(h)(3)

Prevention of contamination of water supplies.

F-4d Equipment and Power Failure: 703.183(h)(4)

Mitigation of effects of equipment failure and power outage.

F-4e Personnel Protection Equipment: 703.183(h)(5)

Prevention of undue exposure of personnel to hazardous waste (e.g., protective clothing and equipment).

- F-5 Prevention of Reaction of Ignitable Wastes
- F-5a <u>Precautions to Prevent Ignition of Ignitable Waste</u>: 703.183(i), 724.117(a)

Describe the precautions taken by a facility that handles ignitable waste to prevent actual ignition, including separation from sources of ignition

such as open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electrical, or mechanical), spontaneous ignition (e.g., heat-producing chemical reactions), and radiant heat. Demonstrate that when ignitable waste is being handled, the owner or operator confines smoking and open flames to specially designated locations. "NO SMOKING" signs must be conspicuously placed wherever a hazard exists from ignitable or reactive waste.

F-5b General Precautions for Handling Ignitable Waste: 703.183(i), 724.117(b)

Describe the precautions taken by a facility that stores ignitable waste and other materials, to prevent reactions which: (1) generate extreme heat or pressure, fire or explosions, or violent reactions; (2) produce uncontrolled flammable fumes, dusts or gases in sufficient quantities to threaten human health or the environment; (3) produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions; (4) damage the structural integrity of the device or facility; or (5) by similar means threaten human health or the environment.

F-5c Management of Ignitable Wastes in Containers: 703.201(c), 724.276

Provide sketches, drawings, or data demonstrating that containers of ignitable waste are located at least 15 meters (50 feet) from the facility's property line.

G. CONTINGENCY PLAN: 703.183(g), 724.150 through 724.156, 724.152(b)

Provide a copy of the Contingency Plan or Spill Prevention Control and Countermeasures (SPCC) Plan amended for hazardous waste management to describe the actions facility personnel will take in response to fires, explosions, or any unplanned sudden or nonsudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility. The plan must have proper seguential numbered pages.

G-1 General Information

Provide the facility name and location, operator, site plan, and description of facility operations.

G-2 <u>Emergency Coordinators</u>: 724.152(d), 724.155

Provide names, addresses, office and home phone numbers, and duties of primary and alternate coordinators and a statement of authorization of the coordinator to commit necessary resources to plan.

G-3 <u>Implementation</u>: 724.152(a), 724.156(d)

Describe how and when the contingency plan will be implemented.

G-4 Emergency Response Procedures

G-4a Notification: 724.156(a)

Describe the methodology for immediate notification of facility personnel and necessary state or local agencies.

G-4b <u>Identification of Hazardous Materials</u>: 724.156(b)

Describe procedures for identification of hazardous materials involved in the emergency.

G-4c Assessment: 724.156(c) and (d)

Describe the policy for assessment of possible hazards to the environment and human health and need for evacuation and notification of authorities. The authorities to be notified should include the on-scene coordinator for that area or the National Response Center.

G-4d Control Procedures: 724.152(a)

Specify control procedures to be taken in the event of a fire, explosion or release.

G-4e Prevention of Recurrence or Spread of Fires, Explosions, or Releases: 724.156(e)

Describe the necessary steps to be taken to ensure that fires, explosions, or releases do not occur, reoccur or spread to other hazardous waste at the facility.

G-4f Storage and Treatment of Released Material: 724.156(g)

Provide for treatment, storage, or disposal of any material that results from a release, fire, or explosion at the facility.

G-4g Incompatible Waste: 724.156(h)(1)

Describe provisions for prevention of incompatible waste from being treated, stored or located in the affected areas until clean-up procedures are completed.

G-4h Post-Emergency Equipment Maintenance: 724.156(h)(2)

Describe procedures for ensuring that all emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

G-4i Container Spills and Leakage: 724.152, 724.271

Specify procedures to be used when responding to container spills or leakage, including procedures and timing for expeditious removal of spilled waste and repair or replacement of the container(s).

G-5 Emergency Equipment: 724.152(e)

Describe the location and specifications of the emergency equipment.

G-6 Coordination Agreement Requirements: 724.137, 724.152(c)

Describe the coordination agreements with local police and fire departments, hospitals, contractors, and state and local emergency response teams to familiarize them with the facility and actions needed in case of emergency. Document refusal to enter into a coordination agreement.

G-7 Evacuation Plan: 724.152(f)

Describe signal(s) to be used to begin evacuation and identify primary and alternate evacuation routes.

G-8 Required Reports: 724.156(j)

Describe the provisions for submission of reports of emergency incidents within 15 days of occurrence, and maintenance of records identifying the time, date, and details of an emergency incident.

H. PERSONNEL TRAINING: 703.183(1), 724.116

This section must have sequential numbered pages.

H-1 Outline of the Training Program: 724.116(a)(1)

This section must have sequential numbered pages.

Provide an outline of both the introductory and continuing training programs by owners or operators to prepare personnel to operate or

maintain the facility in a safe manner. Include a brief description on how training will be designed to meet actual job tasks. Note: On-the-job training may be used to comply with these requirements.

H-la Job Title/Job Description: 724.116(d)(1) and (d)(2)

Provide the job title and job description of each employee whose position at the facility is related to hazardous waste management.

H-1b Training Content, Frequency and Techniques: 724.116(c) and (d)(3)

Describe the content, frequency, and techniques used in both introductory and continuing training (including an annual review of the initial training) for each employee.

H-1c <u>Training Director</u>: 724.116(a)(2)

Demonstrate that the program is directed by a person trained in hazardous waste management.

H-1d Relevance of Training to Job Position: 724.116(a)(2)

Demonstrate that facility personnel are instructed in hazardous waste management procedures (including contingency plan implementation) relevant to their positions.

H-le <u>Training for Emergency Response</u>: 724.116(a)(3)

Demonstrate that facility personnel are able to respond effectively to emergencies and are familiar with emergency procedures, emergency equipment, and emergency systems. The training program should include the following, if applicable:

- Procedures for using, inspecting, repairing, and replacing facility emergency and monitoring equipment
- . Key parameters for automatic waste feed cut-off systems
- . Communications or alarm systems
- . Response to fires
- . Response to groundwater contamination incidents
- . Shutdown of operations

H-2 Implementation of Training Program: 724.116(b), (d)(4) and (e)

Indicate that training has been successfully completed by facility personnel within six months of their employment or assignment to the facility or transfer to a new position within the facility, whichever is later. Employees hired after the effective date of these regulations must not work in unsupervised positions until they have completed the training requirements. Records documenting that the required training has been given to and completed by facility personnel must be maintained.

- I. CLOSURE AND POST-CLOSURE REQUIREMENTS: 703.183(m), 724.210 through 724.220
- I-1 Closure Plans: 703.183(m), 724.212

Include a copy of the written closure plan consistent with I-la through I-lg, including an estimate of the maximum inventory of wastes in storage and treatment at any time. The closure plan must address all units at the facility, including unclosed interim status units for which a Part B permit is not being pursued.

I-la Closure Performance Standard: 724.211

Describe how closure minimizes the need for post-closure maintenance and minimizes releases of wastes and hazardous constituents.

I-lb Partial Closure Activities: 724.212(b)(1) and (2)

If partial closure is anticipated, describe how and when the facility will be partially closed, including an identification of the maximum extent of operation after partial closure. Describe how and when the facility will finally be closed.

I-lc Maximum Waste Inventory: 724.212(b)(3)

Describe the maximum inventory of wastes in storage and in treatment at any time during the life of the facility.

I-ld <u>Inventory Removal, Disposal or Decontamination of Equipment, Structures</u> and Soils: 724.212(b)(4), 724.214

Describe how the hazardous waste inventory will be removed or treated and how all facility equipment, structures and soils will be decontaminated or disposed when closure is completed.

I-1d(1) Closure of Containers: 724.278

Show that at closure, all hazardous waste and hazardous waste residue will be removed from the containment system, and how remaining containers, liners, bases, and soil containing or contaminated with hazardous waste or hazardous waste residues will be decontaminated or removed.

I-5 Financial Assurance Mechanism for Closure: 703.183(o), 724.243

Provide a copy of the established financial assurance mechanism for facility closure. The mechanism must be one of the following:

I-5a Closure Trust Fund: 724.243(a), 40 CFR 264.151(a)(1)

Provide a copy of the closure trust fund agreement with the wording required by 40 CFR 264.151(a)(1) and a formal certification of acknowledgement.

I-5b <u>Surety Bond</u>: 724.243(b) and (c), 724.251(b) and (c)

I-5b(1) Surety Bond Guaranteeing Payment Into a Closure Fund: 724.253(b), 40 CFR 264.151(b)

Provide a copy of the surety bond with the wording required by 40 CFR 264.151(b) and a copy of the standby trust agreement. The bond must guarantee that the owner or operator will fund the standby trust fund in an amount equal to the penal sum of the bond before the beginning of final closure of the facility, or fund the standby trust fund in an amount equal to the penal sum within 15 days of an order to begin closure, or provide alternate financial assurance if the bond is cancelled.

I-5b(2) Surety Bond Guaranteeing Performance of Closure: 724.243(c), 40 CFR 264.151(c)

Provide a copy of the surety bond with the wording required by 40 CFR 264.151(c), guaranteeing that the owner or operator will perform closure according to the closure plan and the requirements of Subpart G.

I-5c <u>Closure Letter of Credit</u>: 724.243(d), 40 CFR 264.151(d)

Provide a copy of the irrevocable letter of credit with the wording required by 40 CFR 264.151(d) and a copy of the standby trust agreement. The letter of credit must be issued for a period of at least one year and be for the amount of estimated closure.

I-5d Closure Insurance: 724.243(e), 40 CFR 264.151(e)

Provide a copy of the certificate of insurance with the wording required in 40 CFR 264.151(e).

I-5e <u>Financial Test and Corporate Guarantee for Closure</u>: 724.243(f), 724.251(f), 40 CFR 264.151(h)

Submit a letter signed by the owner's or operator's chief financial officer and worded as specified by 40 CFR 264.151(f), a copy of the independent certified public accountant's report on examination of the applicant's financial statements for the latest fiscal year, and a special report from the certified public accountant. If a parent company is guaranteeing closure for a subsidiary facility, the corporate guarantee must accompany the preceding items.

I-5f Use of Multiple Financial Mechanisms: 724.243(g)

Provide a copy of a combination of trust fund agreements, surety bonds guaranteeing payment into a closure trust fund, letters of credit, or insurance, together which provide financial assurance for the amount of closure.

I-5g Use of Financial Mechanism for Multiple Facilities: 724.243(h)

Provide a copy of a financial assurance mechanism for more than one facility showing, for each facility, the EPA ID number, name, address, and amount of funds closure assured by the mechanism. The amount of funds available through the mechanism must be no less than the sum of funds that would be available if a separate mechanism had been established and maintained for each facility.

I-8 Liability Requirements: 703.183(q), 724.247

Provide copies of the required items documenting compliance with applicable liability requirements for sudden accidental occurrences.

I-8a Coverage for Sudden Accidental Occurrences: 724.247(a)

Liability coverage must be maintained for sudden accidental occurrences in the amount of at least \$1 million per occurrence with an annual aggregate of at least \$2 million. Liability coverage may be demonstrated in one of three ways:

I-8a(1) Endorsement or Certification: 724.247(a)(1)

Submit a signed duplicate original of the Hazardous Waste Facility Liability Endorsement, with the wording specified by 724.251(i), or of a Certificate of Liability Insurance, with the wording specified by 40 CFR 264.151(j).

I-8a(2) Financial Test for Liability Coverage: 724.247(a)(2), 724.247(f)

Submit a letter signed by the owner's or operator's chief financial officer and worded as specified by 40 CFR 264.151(g), a copy of the independent certified public accountant's report on examination of the applicant's financial statements for the latest fiscal year, and a special report from the certified public accountant. If the applicant is using the financial test to demonstrate both assurance for closure or post-closure care and liability coverage, the letter specified in 40 CFR 264.151(g) must be submitted to cover both forms of financial responsibility. Under these circumstances, a separate letter as specified by 40 CFR 264.151(f) is not required.

I-8a(3) Use of Multiple Insurance Mechanisms: 724.247(a)(3)

Submit items demonstrating required liability coverage through a combination of endorsement or certification and financial test as these mechanisms are specified in this section (see I-8a(1) and I-8a(2)). The amounts of coverage demonstrated must total at least the minimum amounts required by 264.147(a).

K. PART B CERTIFICATION: 703.182

K-1 Facility Certification: 702.126

Applications must be accompanied by a certification letter as specified in 702.126(d). The required signatures are as follows: (1) for a corporation, a principal executive officer (at least at the level of vice-president); (2) for a partnership or sole proprietorship, a general partner or the proprietor, respectively; (3) for a municipal, state, Federal, or other public agency, either a principal executive officer or ranking elected official.

K-2 Engineering Certification: 703.182, Illinois Professional Engineering Act

Technical data, such as design drawings, specifications and engineering studies, must be certified (sealed) by a Professional Engineer who is licensed to practice in the State of Illinois in accordance with Ill. Rev. Stat., par. 5101, Sec. 1 and par. 5119, Sec. 13.1.

16 of 19

L. CONTINUING RELEASES AT PERMITTED FACILITIES [§3004(U)]

L-1. Solid Waste Management Units

Identify each solid waste management unit at the facility. A solid waste management unit is any unit which is not a "regulated unit" and may include any of the following:

- . Landfill
- . Surface impoundment
- . Waste pile
- . Land treatment unit
- . Injection well
- . Incinerator
- . Tank (including wastewater treatment units, elementary neutralization units, and tanks used in reuse/recovery operations)
- . Container
- Storage area, transfer station or waste recycling operation.

L-la Characterize the Solid Waste Management Unit

For each solid waste management unit, submit the following information:

- . Type of each unit
- Location of each existing or closed unit on the topographic map. [See comment B-2.]
- . Engineering drawings for each unit, if available
- . General dimensions of each unit
- . Dates when the unit was in operation
- . Description of the wastes placed in each unit
- . Quantity or volume of waste, if known

17 of 19

L-1b No Solid Waste Management Units

Provide evidence supporting the conclusion that no solid waste management units exist at the facility.

L-2 Releases

Provide all information available on whether or not any releases have occurred from any of the solid waste management units at the facility. Reasonable efforts to identify releases must be made, even if releases have not been verified. (A release may include: spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into the environment. It does not include releases otherwise permitted or authorized under law or discharges into the injection zone of a UIC permitted class I injection well.)

L-2a Characterize Releases

Information on releases must include the following types of available information concerning prior or current releases:

- . Date of the release
- . Type of waste or constituent released
- . Quantity or volume released
- Nature of the release
 - -- Spill
 - -- Overflow
 - -- Ruptured pipe or tank
 - -- Other
- Groundwater monitoring and other analytical data available to describe nature and extent of release. If other than groundwater monitoring data, please describe.
- Physical evidence of distressed vegetation or soil contamination
- . Historical evidence of releases such as tanker truck accidents
- . Any state, local or federal enforcement actions which may address releases

- Any public citizen complaints about the facility which could indicate a release
- . Any information showing the migration of the release.

L-2b No Releases

Provide evidence supporting the conclusion that no releases from solid waste management units exist at the facility.

GTR:bls/3810j,25,43

PMILL 11/5



Illinois Environmental Protection Agency 2200 Churchill Road, Springfield, IL 62706

\$17. Park 769

Refer to.

1930050006 -- Peoria County Sherez Chemical (capany, inc.

ILD 09 75/050 Mik - Permits

161 E. 1900

Sieres Chemical Company, Inc. Bongo 26 F. L. BOX S dapleton, lilitois

Attn: Environmental Courtinator or

Plant immeser

Dear Sir:

According to Agency files, your facility currently consess parardous waste in containers and/or tames subject to the requirements of 50 IAC 700-770. 28 IAC 163.167(1) states that interior status for any legardous waste storage or treatment facility will be terminated Hovember 6, 1949, unless the facility sulaits fact B of the SCFA permit application for these units to this Agency by hoveder 6. 1866. This letter is written to (1) have you mare of this requirement and (2) describe the actions which must be taken in response to TRIS POSSIFICATIONS.

According to 35 law 703.167(f), if an existing facility restres to (1) store hazardous waste on-site for greater than pipery (00) rays, (2) treat hazardous maste, or (3) store herardous toste as a commercial facility after herender 6. 1992, it must solute Part D of the 1964 permit application to this Agency by Hovember B. 1988. The information which past be contained in this application is rescribed in Sh TAC 703, Subpart R. The enclosed cocurrent, entitled "ACPA Permit Colonice" provinces core retail regerants the mecessary contents of the application and also identifies several guidance accusems which will be unifel in developing the application. Also included to tota occurrent is the fore which bust we used when submitting the application.

If a facility does not desire to continue storing an yer treating razardous there after heresher 8, 1991, it must close the storage and/or treatment differed prosent at the facility promote the time mate. Clasure, in this erstance, tasically means east all contamination much be removed from the umitial arm it necessary, from the area servounding these orits. The requirements which rust be not in clustry trese noits are confurred to SE IM. 772, Suspart G. For you convenience, guidance for the development of a Cleave plan is contained in the recience deciment rivitled "Instructions for the Proparation of Closure Plans for lineria Status will be revocus Saute PACTITEDS." PLEASE FORE THAT A CLOSCRE PLAD EGES INT HEEP TO BE SUBDITTED AT THAT I THE ROLL OF LATTE THAT MAY M. 3



Page 2

In some restances, there may be several thickly status imparticula waste remangement orits at a facility. The facility may desire to pursue a final REEA permit for a portion of these units and close the cest of them. Because of the uncertainty associated with this option, all interior status units at a facility must be included in Part 5 of the MIPA permit application, unless a closure plan for the units teing closed to sublitted with the Part R. If a closure plan is supplication with the Part 5, the application need only address trose units which will remain in operation.

The only alternatives avoilable for becarding waste treatment and storage factifities to meet the requirements of 30 IAC 703.167(f) are (1) submit Part C of the RCFA permit application by Howerber b. 1988 or (1) class by Movember B. 1992. Impover, some facilities may have proviously filed Part A of the RCFA permit application in error and now feel that the mazarous waste management artivities curried out at the facility do not require a RCAA permit (i.e. the Part A was filled for protective measures; . If this is the case, the Agency requests that information supporting this position to submitted no later than Resembler S. 1908. The Alexand can then review the information subsitized and correct to records accordingly. The information which wast be submitted to make this compostration is contained in the enclosed document entitled "Facility Part A Sithdrawal Request form."

Finally, some facilities may have closed or are currently closing in accordance with an IIPA approved closure plan. (Please bear in Find this letter is going out to over 200 facilities; some closed facilities may readvertently receive this letter.) In this instance, the Agency requests that a copy of (i) the closure plan approval letter and (i) the letter from the Agency accepting the certifications of the owner/sparator and the rgistered professional eighteer that closure was carried but in accordance with the approved closure plan lif closure has been completed to submitted by Hovesser B. (533. The Agency will again be able to review this information and correct its receres accordingly.

Because of the large number of facilities subject to the regularments of 35 1AC 703.157(f), the Agency requests that all facilities receiving this letter complete the eschosed form entitled "RURA Permit Information Form." The form has been dove open such that it can be used by a facility falling into ony of the five categories described above (pursuing a final permit, planning to close, pursuing a permit for only a portion of the intern status emits and closing the other whits, protective filters, closed in accommance with an IEPA approved closure plan). This form bust he substitted to the Agency no later than Hovember 3. 1258, along with all required attackments. Failure to do so may subject a facility to enforcement under State amplor Federal regulations and possible conclary penalties up to \$20,000 per day of concompliance.



Page 3

The BLRA Permit Information Ferm and all required attachments must be submitted in triplicate (original and two (2) copies) to the following address:

Permit Section, FLFA Unit Division of Land Pollution Control Illinois Environmental Protection Agency 1300 Charcolli Rend P.O. Box (5276 Springfield, IL - CA786-0276

If you have any questions requiring this letter, piesse contact lim Heore at 217,702-1876.

very truly yours,

Lawrence R. Casten, P.E., Namager Permit Section Division of Lawr Fulltion Control

Larthy State (1207) (AND 11-12

Enclosures

cc: Division file Compitance Peorta Region USPEA Region V

US ROUTE 24 . P.O.BOX 9

MAPLETON, IL 61547 TEL [309] 697-6220

SHEREX CHEMICAL COMPANY, INC.

SUBSIDIARY OF SCHERING AG, WEST GERMANY

February 9, 1982

RECEIVEL

FEB 10 1982

STATE OF ILLINOIS

Mr. Monte M Nienkerk Environmental Protection Agency Division of Land/Noise Pollution Control 4500 S Sixth Street Springfield, IL 62706

Dear Mr. Nienkerk:

In reply to your letter dated January 29, 1982, concerning the IEPA inspection on September 29, 1981, of our Mapleton facility:

The two deficiencies that were noted during the inspection have been corrected. The following steps were taken to correct the deficiencies:

Training Records We currently have training records on fifty employees both salaried and hourly in various aspects of RCRA.

2. Aisle Space (drum storage) The situation observed during the inspection no longer exists since the waste in question has been moved to Peoria Disposal. When weather permits, aisle areas around the rows of drums will be marked on the concrete. We expect this to be completed by June 1, 1982.

We also wish to correct certain information contained on the RCRA inspection report. Sherex does not maintain hazardous waste storage tanks or treatment tanks under our interim status permit. The tanks noted in the inspection report are either used to store fuel for our boilers (which is exempt under Subpart A 261.2 c(2)), or are utilized in our manufacturing process. As part of our total plant spill prevention plan, we do include these tanks in certain portions of our RCRA program in the event that there is a spill, which require disposal.

If the above status reports do not meet with your approval, please advise.

Sincerely,

Plant Manager

Sherex Chemical Company, Inc.

RECEIVED

WASTER PROTOCOLY VIOLENT REALISH

Please Print

Facility SHEREX CHEMICAL CO. ID # ILD 095792859

Item #	<u>Item Date</u>	Description	Item Filed
26	1-28-91	Closure Plan appound	sec. 2
27	9-5-91	Follow-up letter to 8-28-91 meeting JEPA and Sherex CE: Corrective Action	sec. Z
28	9-20-91	Final Permit. IEPA & U.S. EPA	Sec. 4)
29		RFA	File Room
30	9-20-91	IERA Administrative Record Checklist	sec. 6
31	12-76-91	TEPA to stenex: Closure certification disapproval for container storage	Sec. 2
32	2-24-92	Sheek to IFPA: Additional information resording Swavs	sec3
<i>3</i> 3	2-24-92	Sherex to FEPA: additional information for container storage closure	sec. 3
34	4-22-92	TEPA to sherex: approval of Container and certification of closure	Sec. 2
		:	
			
			
ILLINOIS-	-16		

PART B DOCKET LOG

Please print

Facility SHEREX CHEMICAL CO

ID# ILD 095 792 859

tem #	Item Date	Description	<pre>Item Filed *</pre>
22-1	11/9/88	Part B Application	stelf
2	12/53/88	ÎEPA Completenes review NOD	sec. 2
3	216190	IEPA regnest for modified Part B	sec. 2
4	5/2/90	UST corrective Action Report dated Jan. 1990	Part B Folder A
5	5/2190	Plant Flood Emergency Response Plan	Folder A
6	5/2/90	Partial Closure plan for old storage accounty	Polde, A
7	5/2/90	Part B Evergency Response Pan Rev 3190	Folder A
8	5/2/90	Sherex Part B revision in response to 12-23-88	shelf
g	6-29-90	IEPA review & Item 8, start technical review	sec. 2_
10	9-14-90	IEPA technical NOO	sec. Z
11	12-18-90	Sheer NOD response, closere Plan for old storage onea #1	Folkler 14
12	1-11-91	U.S. EZA request for Part B information on Air Yenissions, subparts 147 + 1317	ser. Z
13	1-14-91	Phone Conversation re: subparts of + BB	sec. 2
14	1-16-91	IEDA second technical review NOD	sec Z
15	271-91	Sheek response to Item 12. Non-regulated by Supports An and Bas	sec. Z
16	4-4-91	Part 3 reply to IEPA NOO Sated 1-16-91	5/4
17	1-28-91	Closure Plan approval / Review notes and Chadalist	Ser Z
18	11-5-90	Part B NOD Response to 9-14-90	Folder A
19	6-11-91	Shorex response to an IEDIT phone call	Sec. 2
20	6-13-011	Draft Permit, Statement of Basis (U.S. EPA) and (U.S. EPA) SEPA Fact Sheet	Sec. 5
21	6-25-611	Public Notice of Droft Permit	ser. 6
22	6-25-91	IEPA Draft Permit	star Sc.
23	8-5-91	Revised Closure Cost Part B	Se Z
24	8-13-41	TEPA Public Involvement Cheditist	Sech
25	9-4-91	Transmitted letter, U.S. EZA Final Permit and * Folder I is arranged	506.5



Illinois Environmental Protection Agency P. O. Box 19276, Springfield, IL 62794-9276

217/782-6762

Refer to: LPC #1438050006 -- Peoria County

Sherex Chemical Company

ILD095792859

RCRA Permit Log No. 111

June 29, 1990

Sherex Chemical Company, Inc. Serin R. Rao, Plant Environmental Engineer Post Office Box 9 Mapleton, Illinois 61547

Dear Mr. Rao:

The Illinois Environmental Protection Agency has reviewed Part B of RCRA Permit application for the two (2) hazardous waste container (SO1) storage areas as identified in the application dated November, 1988 and received November 9, 1988 and May 2, 1990 for the above referenced facility. The Agency has determined that the RCRA Part B application is administratively complete in accordance with 35 Illinois Administrative Code 705.122. The Agency will now begin a comprehensive technical review to assure the facility's conformance to the requirements of 35 Illinois Administrative Code Parts 703 and 724. Additional information may be requested in accordance with Illinois Administrative Code 705.122(f).

If you have any questions regarding this subject, please feel free to contact G. Tod Rowe of my staff at 217/782-6762.

Very truly yours,

Lawrence W. Eastep, P.E., Manager

Laurence W Eastephyer

Permit Section

Division of Land Pollution Control

LWE:GTR:jk/2310n,6

cc: Division File

Administrative Record

Peoria Region

George Hamper, USEPA Region V



Illinois Environmental Protection Agency . P. O. Box 19276, Springfield, IL 62794-9276

217/782-6762

1438050006 -- PEORIA CO. Refer to:

ILD095792859

RCRA Permit Log #111

Certified Mail # P106007 927

February 6, 1990

Sherex Chemical Company, Inc.

Attn: Plant Environmental Engineer

P.O. Box 9

Mapleton, IL 61 547

Ladies/Gentlemen:

The purpose of this letter is to remind you that your revised RCRA Part B permit application is due May 1, 1990. Unless we receive your revised application by May 1, 1990, the Agency will begin the process of terminating interim status for your facility pursuant to 35 Ill. Adm. Code 703.157(b). This would require closure of your RCRA hazardous waste management unit(s).

If you have any questions, contact Charlie Zeal at 217/782-6762.

Very truly yours,

Lawrence W. Eastep, P.E., Manager

Lawrence W Easter Byes

Permit Section

Division of Land Pollution Control

LWE:CAZ/mls/0465n/4

cc: Division File Regional Office Compliance Section Enforcement

USEPA Region V, George Hamper

Charlie Zeal



RCRA-IMS U.S. EPA, REGION V